



November 13, 2019

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Hon. Margo K. Brodie
United States District Court, Eastern District of New York
225 Cadman Plaza
Brooklyn, New York 11201

Re: Town of Islip v. Thomas Datre, Jr. et al.
Reply in Support of Joint Letter Motion
Case No. 16-cv-2156 (MKB/LB)

Dear Judge Brodie:

The firm of Allen & Desnoyers LLP represents the Defendant Cooper & 6th Property LLC (“Defendant Cooper”) in the above-referenced matter. We submit this letter to join in the reply of Defendant Louisiana Purchases, LCC dated November 11, 2019 and in support of the Joint Letter Motion for settlement of this matter on behalf of the Settling Defendants. For that purpose, we adopt the arguments set forth in the letter of Defendant Louisiana Purchase, LLC as if fully set forth here.

The Non-Settling Defendants are in the process of scheduling depositions as their schedules permit without the input or consideration of the Settling Defendants. Defendant Cooper, in consideration of settlement, has been afforded the benefit of a stay to submit an answer and pursue discovery. Given the stay, and the Non-Settling Defendants’ ongoing discovery, the opposition of the Datre Sr. Defendants to the Joint Letter Motion, besides being meritless, will serve to significantly prejudice Non-Settling Defendants in the defense of any and all claims against them and any crossclaims they may interpose.

Accordingly, it is respectfully requested that the Joint Letter Motion be granted in its entirety at the Court’s earliest opportunity.

Respectfully submitted,

s/Denise J. D'Ambrosio (3519)
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cc: All Counsel (by ECF)